



Policy:

**SOCIAL, ENVIRONMENTAL AND CLIMATE
RESPONSIBILITY POLICY (PRSAC)**

Code. Version:

3380.ORG.03

**For questions about this policy, please contact:
Talents, Brand and ESG Area**

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Owner: Head of ESG

Approved by: Board of Directors

Users: All employees



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History:

Version	Date	Description	Owner
01	15/06/2015	Implementation of the first version of the Social and Environmental Responsibility Policy of Bank ABC Brasil.	Eduardo Grell
02	14/09/2017	Review of the Social and Environmental Responsibility Policy of Bank ABC Brasil, including risk classification by sector/product and establishing new rules for application and waiver of the social and environmental questionnaire.	Alexandre Sinzato
03	18/09/2018	Inclusion of policy guidelines (Chapter 4) Adjustments in responsibilities (Chapter 5) Transfer of operational procedures to the Social and Environmental Risk Manual.	Alexandre Sinzato
04	10/20/2022	Implementation of the first version of the Social, Environmental and Climate Responsibility Policy of Banco ABC Brasil	Antonio Celso Ferrari Sacco
05	10/10/2023	Revision of the Social, Environmental, and Climate Responsibility Policy of Banco ABC Brasil. Adjustments in Governance (Chapter 5) and change in the individual responsible for the observance of PRSAC to the VP of Talent, Brand, and ESG.	Fabiana Ferreira da Silva

Note: This Policy must be reviewed by the Owner annually or more frequently, if necessary.

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1. Introduction

The Social, Environmental and Climate Responsibility Policy ("PRSAC," "Policy") comprises the set of social, environmental and climate principles and guidelines that Banco ABC ("Bank") takes into account when conducting its business, activities, processes and relationships with its stakeholders.

In order to ensure its effectiveness, this Policy provides for the governance structure responsible for its compliance.

This Policy meets the requirements of Resolution 4.945/2021 of the National Monetary Council.

2. Scope

This Policy is applicable to all business, processes and activities of Banco ABC's prudential conglomerate that are supervised by the Central Bank of Brasil.

3. Principles

Banco ABC adopts the following guiding principles for the preparation and implementation of this Policy:

1. Alignment with the bank's strategy: To be the preferred partner of large and medium-sized companies, their employees and suppliers, based on a personalized relationship, multi-product offer and Omnichannel service model, leveraging talents, technology and data analytics to deliver added value with sustainable business practices;
2. Guidelines, governance and actions proportionate to the business model, the nature of operations and the complexity of the Bank's products, services, activities and processes;
3. Guidelines, governance and actions appropriate to the dimension and relevance of exposure to social risk, environmental risk and climate risk; pesquisa
4. Governance structure capable of implementing the provisions of this Policy and promoting its integration into the organizational culture, improving products, services, activities and internal processes;

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5. The main impacts of a social, environmental or climatic nature arising from products, services, activities and processes are taken into account;
 6. Compliance with any other applicable laws or regulations.

4. Policy Guidelines

Banco ABC has a sustainability strategy that includes corporate issues (related to internal activities and processes) and sustainable finance (related to business, through the Bank's products and services).

The drivers of this sustainability strategy observe the following guidelines adopted by Banco ABC in its relationship with its stakeholders:

4.1. Customers

- Not tolerate any form of discrimination with customers;
- Ensure customer data privacy and security;
- Have an adequate relationship with the customer, always aiming for their greatest satisfaction, in addition to investing in digital transformation and innovation to improve their experience;
- Based on the products and services:
 - support companies, including small and medium-sized ones, to grow and generate jobs;
 - support the sustainable development of society by working to promote specific sectors of the economy that contribute to a more sustainable economy;
 - support customers in the transition to more sustainable practices;
- Assess in advance the potential negative social, environmental and climate impacts from new types of products and services and also assess how these factors affect its customers by including these factors in risk management;

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4.2. Internal Community

- Not tolerate any form of discrimination against the internal community, considering the promotion of inclusion, diversity and equity, observing, whenever possible and in equal conditions of competence, working for the inclusion of employees with differences such as race and ethnicity, age, gender, disability, religion, culture and sexual orientation;
- Ensure the privacy and security of internal community data;
- Contribute to the development of the internal community, supporting the individual trajectory of each one and contributing to excellence in the relationship with customers and society;
- Implement the necessary ethical standards, as well as the behavioral parameters that should guide the conduct of the internal community when providing services and offering products, in order to cultivate a constructive and fair relationship between the Bank, its customers and society;
- Carry out programs with the purpose of promoting the satisfaction, health and well-being of employees within the corporate environment and developing a more diverse and inclusive environment, favoring the exchange of experiences, creativity, innovation, productivity and results;
- Ensure the effective adoption of the Code of Ethics of Banco ABC, which applies to all employees, suppliers, service providers and subsidiaries.

4.3. Suppliers

- Stand out for ethics and transparency in relationships involving the purchase of product supplies and contracting of suppliers in general, ensuring the requirements of fair competition, quality, safety, social, environmental and climate responsibility, and continuous improvement of the Bank's relationship with its suppliers;

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- Ensure compliance and observance of the guidelines defined in this Policy by material suppliers and service providers;
 - Ensure the effective adoption of the Code of Ethics of Banco ABC, which applies to all employees, suppliers, service providers and subsidiaries.

4.4. Environment

- Continuously develop the sustainable finance agenda, including, but not limited to, contributing to address climate challenges through credit granting and service provision;
- Identify and manage risks in order to minimize possible negative environmental and climate impacts from products, services, activities and processes;
- Identify and capture opportunities to expand the generation of positive environmental and climate impacts from products, services, activities and processes;
- Manage and be transparent with regard to climate impacts, in view of pacts and commitments adopted by the bank, such as:
 - Measurement and offset through the methodology provided by the GHG Protocol;
 - Offset of scope 1 and 2 greenhouse gas (GHG) emissions;
 - Disclosure of material climate information through CDP.

4.5. Investors

- Ensure the privacy and security of investor data;
- Identify and capture opportunities for allocating investors' financial funds to businesses that foster mitigation of negative impacts and/or generation of positive impacts of a social, environmental and climate nature;

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- Through its communication channels, provide material, clear and accurate information related to sustainability to shareholders and investors in a timely and appropriate manner.

4.6. Society

- Identify and manage risks in order to minimize possible negative social impacts from products, services, activities and processes;
- Identify and capture opportunities to expand the generation of positive social impacts from products, services, activities and processes;
- Comply, from the viewpoint of continuous improvement, with the United Nations Global Compact guidelines, in an initiative to align the Bank's strategies and operations with the Ten Universal Principles in the areas of Human Rights, Labor, Environment and Anti-corruption;
- Adopt private social investment strategies in order to contribute positively to addressing social, environmental and climate challenges;
- Allocate funds for the performance of activities to encourage culture and activities of a philanthropic nature;
- Encourage the internal community to provide voluntary services and carry out special philanthropy campaigns.

5. Governance

The governance for implementing the PRSAC is described below:

5.1. Board of Directors

It is incumbent on the Board of Directors:

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- Approve and review the Social, Environmental and Climate Responsibility Policy;
 - Ensure the adherence of the institution to the policy, its effectiveness and compatibility with other established policies.

5.2. ESG Committee

Bank ABC Brasil has an ESG Committee with the following composition: CEO, two members of the Board of Directors, VP of Talent, Brand and ESG, and an independent member. This board meets quarterly.

The ESG Committee is responsible for:

- Evaluate the strategies brought by the ESG Commission and advise the Board of Directors on decision-making based on strengthening the ESG Agenda and fostering the sustainability culture of Banco ABC Brasil;
- Propose recommendations to the Board of Directors on the establishment and review process of the Social, Environmental and Climate Responsibility Policy ("PRSAC");
- Evaluate the degree of adherence of the actions implemented in the PRSAC and, when necessary, propose recommendations for improvement;
- Keep records of the recommendations addressed in the above paragraphs.

5.3. ESG Commission

The Bank also has an ESG Commission, segmented into three pillars, with the following composition:

- **Environmental – Sponsor: Corporate/C&IB VP.**

Permanent members: Head of C&IB, Head of FI, Head of ALM, Head of Products, Head of Socio-environmental and Climate Risk.

Guests: Head of Facilities, Head of Marketing.

- **Social – Sponsor: Financial Administrative VP.**

Permanent members: Head of Cash Management, Head of TX, Head of Technology, Head of Corporate, Head of Funding.

Guests: Talent Attraction Coordinator.

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- **Governance– Sponsor: Risk VP.**

Permanent members: Head of RI, Head of Legal, Head of Compliance.

Guests: Head of Marketing.

The Commission is responsible for:

- Monitor the development and application of the ESG Agenda at Banco ABC Brasil, analyze the related indicators, establish guidelines related to the best market practices on ESG and submit those for evaluation to the ESG Committee and the Executive Committee;
- Monitor the progress and evolution of key indicators, projects and processes;
- Monitor the bank's performance in the face of the main ESG demands of the market, regulators, and civil society.

5.4. Talents, Brand and ESG Area

Based on CMN Resolution 4.945, the responsibilities of this area include:

- The Talent, Brand & ESG VP will be responsible for the observance of the PRSAC;
- To execute, manage and monitor the progress of the Bank's sustainability strategy;
- To support the ESG Committee and the ESG Commission and prepare the agenda for the meetings of both bodies;
- To support the Board of Directors in the preparation and review of the PRSAC
- To implement actions and support other areas in the implementation and/or improvement of actions with a view to the effectiveness of the PRSAC;
- To coordinate monitoring and evaluation of the actions implemented with a view to the effectiveness of the PRSAC;
- To ensure the disclosure of this Policy and actions aimed at its effectiveness;
- To search for and devise specific training programs for the development of teams with a focus on social, environmental and climate responsibility;
- To establish and disclose the desired personal and professional ethics, as well as the behavioral parameters that should guide the conduct of employees, according to the guidelines described in the Ethical Principles and Rules of Conduct.

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5.5. Social, Environmental and Climate Risk Management Area

It is incumbent on this area:

- To establish procedures for adapting social, environmental and climate risk management to legal, regulatory and market changes;
- To support the training of areas that integrate the social, environmental and climate risk management lines of defense;
- To monitor discussions on responsibility and on social, environmental and climate risk at the entities in which Banco ABC Brasil participates;

5.6. Areas involved in credit granting

In addition to the social, environmental and climate risk management area, other areas have responsibilities related to this PRSAC in the credit granting process.

These areas include, but are not limited to, the following:

- Commercial;
- Credit;
- Compliance;
- Legal.

5.7. Product Area

It is incumbent on this area:

- To ensure prior assessment of potential negative social, environmental and climate impacts and risks of new types of products and services;
- To contribute to the development of products that allow Banco ABC to increase its positive social, environmental and climate impacts.

6. Transparency and Reporting

Banco ABC will make available to the external audience, on its website, the PRSAC and the actions implemented with a view to its effectiveness, in addition to the criteria for its assessment.

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Likewise, national or international pacts, agreements or commitments of a social, environmental or climate nature that are relevant to this PRSAC will be made available to the external audience.

In addition to the Ombudsman's Office, Banco ABC also provides a whistleblower channel on its website to ensure the protection of stakeholders who have contact with the bank's services and products.

7. Related documents

CMN Resolution No. 4.945, of September 15, 2021 – Provides for the Social, Environmental and Climate Responsibility Policy (PRSAC) and actions aimed at its effectiveness;

CMN Resolution No. 4.943, of September 15, 2021 – Provides for the risk management framework and the capital management framework as well as the information disclosure policy;

0001.ORG - Purchases and Contracting of Suppliers;

1000.ORG - Ethical Principles and Rules of Conduct;

0500.PRC - Internal Communication Procedure.

8. Review

The PRSAC will be reviewed in accordance with the recommendations of the ESG Committee, on an annual basis, or more frequently when updating is required.

9. Definitions

Customers: Individuals or legal entities, without any employment or functional relationship with Banco ABC, who, on their own behalf or on behalf of third parties, use or intend to use programs and services provided by Banco ABC.

Sustainable Development: Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Diversity: A set of cultural, biological, social and economic characteristics that make each person a unique being. It can also be understood as plurality, multiplicity, heterogeneity, variety and difference.

Equity: The guarantee of fair treatment and opportunities.

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Supplier: Any individual or legal entity who, by means of a contractual instrument, is responsible for supplying goods or services to Banco ABC.

Governance: A system through which Banco ABC makes decisions and implements them in pursuit of its objectives.

Inclusion: Involves a set of actions that provide equal access to participation, rights and opportunities for everyone. It is related to meeting diverse individual needs, providing an environment that is free from discrimination and prejudice and that cultivates a sense of belonging.

Environmental nature: The preservation and remediation of the environment, including its rehabilitation, where possible.

Climate nature: Banco ABC's positive contribution to the transition to a low carbon economy, where the emission of greenhouse gases is reduced or offset and the natural mechanisms for capturing these gases are preserved; and to the reduction of impacts caused by frequent and severe weather conditions or long-term environmental changes, which may be associated with changes in climate patterns.

Social nature: Respect, protection and promotion of fundamental rights and guarantees of common interest.

Stakeholders: Individual or group that has an interest in any decisions or activities of Banco ABC. They include:

- a) customers;
- b) internal community, formed by management and employees;
- c) suppliers;
- d) environment;
- e) investors;
- f) society: which means the relevant communities in the surroundings of the activities, processes and businesses developed by the banks, when identification is possible.

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